## BEFORE THE POSTAL RATE COMMISSION

RECEIVED FEB 3 9 49 AM '00

POSTAL RATE COMMISSION OFFICE OF THE SECRITARY

POSTAL RATE AND FEE CHANGES, 2000

DOCKET NO. R2000-1

FIRST SET OF INTERROGATORIES FROM UNITED PARCEL SERVICE TO UNITED STATES POSTAL SERVICE WITNESS MEEHAN (UPS/USPS-T11-1 through 2) (February 3, 2000)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories directed to United States Postal Service witness Meehan (UPS/USPS-T11-1 through 2).

Respectfully submitted,

John E. McKeever William J. Pinamont Phillip E. Wilson, Jr.

Attorneys for United Parcel Service

Piper Marbury Rudnick & Wolfe L.L.P. 3400 Two Logan Square 18th & Arch Streets
Philadelphia, PA 19103-2762 (215) 656-3310 (215) 656-3301 (FAX) and 1200 Nineteenth Street, NW Washington, DC 20036-2430 (202) 861-3900

Of Counsel.

## INTERROGATORIES OF UNITED PARCEL SERVICE TO UNITED STATES POSTAL SERVICE WITNESS MEEHAN

UPS/USPS-T11-1. Refer to pages 3-9 of your testimony, where you discuss changes in the treatment of costs and the development of base year costs. Identify any instances in which the Postal Service has departed from the costing methods used by the Commission in Docket No. R97-1 that are not discussed in your testimony or in the testimony of any other Postal Service witness, describe the change, and explain why the change was made.

UPS/USPS-T11-2. For each change in costing method listed in response to UPS/USPS-T11-1, explain all consequences of the change on Base Year 1998 costs as compared to the costs that would have resulted in the absence of the change.

## CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document by first class mail, postage prepaid, in accordance with Section 12 of the Commission's Rules of Practice.

Phillip E. Wilson, Jr.

Attorney for United Parcel Service

Dated: February 3, 2000

Philadelphia, Pa.